

AGRICULTRUAL OFFICE EMBASSY OF MEXICO

Washington, D.C., July 24, 2006

LLOYD DAY
ADMINISTRATOR
AGRICULTURAL MARKETING SERVICE
USDA

Standardization Section
Fresh Products Branch
Fruit and Vegetables Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1450 Independence Avenue, SW
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Re: Comments on Proposed Voluntary United States Standards for Grades of Tomatoes on the Vine (USDA Docket No. SV-06-09)

Dear Mr. Day:

These comments are being submitted on behalf of Mexico's Secretariat of Agriculture, Livestock, Rural Development, Fisheries and Food ("SAGARPA") in response to the request for public comment on proposed voluntary United States standards for grades of tomatoes on the vine ("TOV"). 71 Fed. Reg. 30367 (May 26, 2006). USDA stated that the purpose of these proposed standards is to provide industry with a common language and uniform basis for treating TOV, thus promoting the orderly and efficient marketing of such products.

Initially, SAGARPA would like to express its view that the promulgation of these proposed regulations is a positive step. SAGARPA supports this effort to establish voluntary standards for TOV. After reviewing the draft of the proposed standards, SAGARPA would like to make the following comments.

- SAGARPA supports the efforts of AMS in seeking to recognize higher tolerances within individual packages. However, SAGARPA would suggest that defects be scored based on the total count of tomatoes in the box or package rather than the number of bunches or containers in the box.
- SAGARPA does have some concerns about the proposed shatter standard. The standard does not seem to be based upon any publicly available data. Indeed, SAGARPA is not aware if such data exists. For this reason, SAGARPA would suggest that whatever tolerances are established for shatter standards, they be viewed as "interim" standards, to be reviewed within a relatively short time period to see if they need to be adjusted to better comport with commercial reality.



- 3. SAGARPA supports the inclusion of a maturity standard in the proposed standard, and believes that the requirement stated, that the tomatoes should show at least a break in color, is reasonable.
- SAGARPA would suggest the size standard be removed from the grade standard, given the degrees and variations of size of individual tomatoes within a cluster as well as a box TOV.
- 5. SAGARPA believes that cherry and cocktail tomatoes on the vine should be excepted from the proposed standard at this time.

Your consideration of these comments is appreciated.

RESPECTIVELY SUBMITTED,

CARLOS VAZQUEZ O.
MINISTER FOR AGRICULTURAL AFFAIRS